

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

SARA RIVERS (formerly known as Sara Stokes),

Plaintiff,

Case No.: 25-CV-01726 (JSR)

-against-

**ORAL ARGUMENT
REQUESTED**

SEAN COMBS (a/k/a “P. DIDDY, DIDDY, PUFF,
PUFF DADDY, PUFFY, BROTHER LOVE”),
BAD BOY ENTERTAINMENT HOLDINGS, INC.,
HARVE PIERRE, TRACY WAPLES,
ALISON STANLEY, CHRIS SAINSBURY,
DEVYNE STEPHENS, MORMA AUGENBLICK,
DEREK WATKINS (a/k/a FONZWORTH BENTLEY),
TONY DOFAT, MICKEY CARTER,
DERIC ANGELETTIE (a/k/a/ “D.Dot” and
“MADD RAPPER”), JASON WILEY, BAD BOY
ENTERTAINMENT LLC, PHIL ROBINSON,
SHAWN PEREZ, DADDY’S HOUSE RECORDING
STUDIO, BAD BOY PRODUCTIONS INC.,
COMBS ENTERPRISES, LLC, UNIVERSAL
MUSIC GROUP, UNIVERSAL MUSIC & VIDEO
DISTRIBUTION CORP., JANICE COMBS, JANICE
COMBS PUBLISHING INC., JANICE COMBS
PUBLISHING HOLDINGS INC., SEAN JOHN
CLOTHING LLC., PARAMOUNT GLOBAL, VIACOM,
MTV PRODUCTIONS, JACKIE FRENCH, LOU
PEARLMAN (estate of), BUNIMMURRAY
PRODICTIONS, TOWNSQUARE MEDIA GROUP, J
OHN AND JANE DOES 1-50, and DOE ORGANIZATIONS
1-10,

Defendants,

X

DEFENDANT DERIC ANGELETTIE’S NOTICE OF MOTION TO DISMISS

THE COMPLAINT WITH PREJUDICE

PLEASE TAKE NOTICE, that, upon the accompanying Memorandum of Law
and all other pleadings herein, Defendant Deric Angelettie (referred in the Complaint as ,

“DERIC ANGELETTIE a/k/a/ ‘D.Dot’ and ‘MADD RAPPER’), hereby moves before the Honorable Jed S. Rakoff for an order pursuant to Rule 8 and Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the claims asserted against him in the Complaint with prejudice for failure to state a claim upon which relief can be granted. Pursuant to the scheduling order set forth in the Court’s July 23, 2025 ECF Entry—which memorialized a joint call between Plaintiff’s counsel, counsel for Deric Angelettie, and chambers held on July 23, 2025—Plaintiff’s answering papers are to be filed no later than August 5, 2025, and Defendant Deric Angelettie’s reply papers are to be filed no later than August 12, 2025. Oral argument on the motion is scheduled for August 13, 2025 at 11:00 a.m. in Courtroom 14B of 500 Pearl Street, New York, NY.

Dated: New York, New York
July 24, 2025

KEITH WHITE, PLLC

/s/Keith White
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Attorneys for Defendant Deric Angelettie